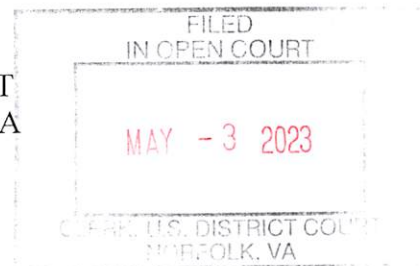


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA,

v.

JEREMY JOHN GLEASON,
(Counts 1, 2, 3, 8, & 11)

ANDREW RYAN HIGGINS,
(Counts 1, 4, & 12)

JONATHAN WILLARD LOWNEY,
(Counts 1, 6, 7, 9, & 13)

KENNETH DALE LOWNEY,
(Counts 1 & 10)

PATRICK SEAN MCNULTY,
(Counts 1 & 5)

AMANDA NICOLE CARTER,
a/k/a "Amanda Nicole Walker"
(Count 1)

) CRIMINAL NO. 4:23-cr- 40
) UNDER SEAL
)
) 21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)
) Conspiracy to Distribute Methamphetamine
) (Count 1)
)
) 21 U.S.C. § 841(a)(1)
) Distribute Methamphetamine
) (Counts 2, 3, 4, & 5)
)
) 21 U.S.C. § 841(a)(1)
) Possess with Intent to Distribute
) Methamphetamine
) (Count 6)
)
) 18 U.S.C. § 924(c)(1)(A)
) Possession of a Firearm in Furtherance of
) Drug Trafficking Crime
) (Count 7)
)
) 18 U.S.C. § 922(g)(1)
) Felon in Possession of a Firearm
) (Counts 8, 9, & 10)
)
) 21 U.S.C. § 856(a)(1)
) Maintaining a Drug-Involved Premises
) (Counts 11, 12, & 13)
)
) 18 U.S.C. § 924(d); 21 U.S.C. § 853
) Criminal Forfeiture

INDICTMENT

MAY TERM - at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Distribute 500 Grams or More of Methamphetamine)

Beginning on or about May 1, 2020, and continuing until in or around March 2023, the exact dates being unknown to the grand jury, in the Eastern District of Virginia, the defendants, JEREMY JOHN GLEASON, ANDREW RYAN HIGGINS, JONATHAN WILLARD LOWNEY, KENNETH DALE LOWNEY, PATRICK SEAN MCNULTY, and AMANDA NICOLE CARTER, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

Distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

(In violation of Title 21 United States Code, Sections 846, 841(a)(1), and (b)(1)(A)(viii)).

COUNT TWO

(Distribute Methamphetamine)

On or about April 6, 2021, in the Eastern District of Virginia, the defendant, JEREMY JOHN GLEASON, did unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance.

(In violation of Title 21 United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT THREE

(Distribute Methamphetamine)

On or about April 20, 2021, in the Eastern District of Virginia, the defendant, JEREMY JOHN GLEASON, did unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance.

(In violation of Title 21 United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT FOUR

(Distribute Methamphetamine)

On or about December 10, 2021, in the Eastern District of Virginia, the defendant, ANDREW RYAN HIGGINS, did unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance.

(In violation of Title 21 United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT FIVE

(Distribute Methamphetamine)

On or about December 1, 2022, in the Eastern District of Virginia, the defendant, PATRICK SEAN MCNULTY, did unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance.

(In violation of Title 21 United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT SIX

(Possession with Intent to Distribute Methamphetamine)

On or about December 19, 2022, in the Eastern District of Virginia, the defendant, JONATHAN WILLARD LOWNEY, did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance.

(In violation of Title 21 United States Code, Section 841(a)(1) and (b)(1)(C)).

COUNT SEVEN

(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about December 19, 2022, in the Eastern District of Virginia, the defendant, JONATHAN WILLARD LOWNEY, did unlawfully and knowingly possess a firearm to wit: a SAR USA, SAR 9, 9mm caliber, semiautomatic handgun, S/N: T1102-20BV86751, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, namely: Conspiracy to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(A)(viii) as set forth in Count 1 of this Indictment, which description of said drug trafficking crime is re-alleged and incorporated by reference as set forth in full herein.

(In violation of Title 18 United States Code, Sections 924(c)(1)(A)).

COUNT EIGHT

(Felon in Possession of a Firearm)

On or about March 7, 2020, in the Eastern District of Virginia, the defendant, JEREMY JOHN GLEASON, having knowingly been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate commerce, a firearm, to wit: a CHARLES DALY CDD-15 rifle, S/N: CDD02248, which had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18 United States Code, Sections 922(g)(1) and 924(a)(8)).

COUNT NINE

(Felon in Possession of a Firearm)

On or about December 19, 2022, in the Eastern District of Virginia, the defendant, JONATHAN WILLARD LOWNEY, having knowingly been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate commerce, a firearm, to wit: a SAR USA, SAR 9, 9mm caliber, semiautomatic handgun, S/N: T1102-20BV86751, which had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18 United States Code, Sections 922(g)(1) and 924(a)(8)).

COUNT TEN

(Felon in Possession of a Firearm)

On or about March 7, 2020, in the Eastern District of Virginia, the defendant, KENNETH DALE LOWNEY, having knowingly been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate commerce, a firearm, to wit: a CHARLES DALY CDD-15 rifle, S/N: CDD02248, which had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18 United States Code, Sections 922(g)(1) and 924(a)(8)).

COUNT ELEVEN

(Maintaining a Drug-Involved Premises)

From on or about May 1, 2020, and continuing until in or around May 2022, in the Eastern District of Virginia, the defendant, JEREMY JOHN GLEASON, did unlawfully and knowingly use and maintain a place located at 85 Ewellville Lane, Dutton, VA, Virginia, for the purpose of manufacturing, distributing, and using a controlled substance.

(In violation of Title 21 United States Code, Sections 856(a)(1) and (b)).

COUNT TWELVE

(Maintaining a Drug-Involved Premises)

From on or about November 23, 2021, and continuing until on or about March 24, 2022, in the Eastern District of Virginia, the defendant, ANDREW RYAN HIGGINS, did unlawfully and knowingly use and maintain a place located at 9765 Maryus Road, Gloucester, Virginia, for the purpose of manufacturing, distributing, and using a controlled substance.

(In violation of Title 21 United States Code, Sections 856(a)(1) and (b)).

COUNT THIRTEEN

(Maintaining a Drug-Involved Premises)

From on or about March 7, 2020, and continuing until on or about January 13, 2023, in the Eastern District of Virginia, the defendant, JONATHAN WILLARD LOWNEY, did unlawfully and knowingly use and maintain a place located at 3434 Lowneyville Lane, Gloucester, Virginia, for the purpose of manufacturing, distributing, and using a controlled substance.

(In violation of Title 21 United States Code, Sections 856(a)(1) and (b)).

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Six and Eleven through Thirteen of this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation.
2. The defendants, if convicted of any of the violations alleged in this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.
3. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).
4. The property subject to forfeiture includes but is not limited to:
 - a. a SAR USA, SAR 9, 9mm caliber, semiautomatic handgun, S/N: T1102-20BV86751, referenced in Counts Seven and Nine; and
 - b. a CHARLES DALY CDD-15 rifle, S/N: CDD02248, referenced in Counts Eight and Ten.

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code, Sections 924(d)(1); and Title 28, United States Code, Section 2461(c)).

United States v. Jeremy John Gleason, et al.

Criminal No. 4:23-cr-40

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

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